

## REMARKS

Claims 3-5 and 7 have been cancelled. Claims 1, 2, 6, 8-20 have been amended in this response to clarify the invention. Claims 1, 2, 6, 8-20 are currently pending.

### Drawings

The drawings were objected to because of solid black shading areas. The drawings have been amended to eliminate black shaded areas and replacement drawing sheets including all of the figures appearing on the prior version of the revised sheets are attached to this response.

### Claim Rejection 103

The claims were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6045671 to Wu (Wu) with or without a combination with other art. Applicant respectfully disagrees.

With regard to independent claim 1, the present invention as claimed provides clusters of plasma guns for depositing plasma on a substrate. Each gun in the cluster is controlled such that the type and amount of plasma deposited at a selected area of the substrate is controlled. (see, for example, Table 1 showing the input power for a gun in Watts associated with a deposition at a specified position). Wu does not disclose controlling the amount of plasma deposited on the substrate by varying the power supplied to the gun. Wu controls plasma deposit amount through the use of masks. (see Col 10, lines 16-19: "Moving the mask relative to the substrate provides precise control over the location and amount of each component deposited onto selected regions of the substrate" and Col 26, lines 45-47: "The laser system 330 incorporates the shutter masks shown in FIG. 5 to control the deposition of the irradiated target materials onto substrate 336, as described above"). One skilled in the art would recognize the unique features of the present invention and would not have thought the present invention obvious in light of Wu or Wu combined with any of the other art cited.

In view of the novel features of claim 1, and in that all the remaining claims depend on claim 1, it is respectfully submitted that this application is patentably distinguishable over the cited art. Reconsideration and withdrawal of the rejection are requested.

### Conclusion

As evidenced by the foregoing amendments and remarks, it is respectfully submitted that the present application is in form to be passed to allowance. Accordingly, a notice of allowance is requested.

Should the Examiner have any questions or suggestions, applicants' undersigned attorney requests that the Examiner initiate a telephone call to expedite prosecution of the application.

Respectfully submitted,



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